

# EXHIBIT 13

Highly Confidential - Brent Wright

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION  
4 \_\_\_\_\_  
5 )  
6 ) Civil Action No.  
7 In Re FLINT WATER CASES ) 5:16-CV-10444-JEL-MKM  
8 ) (Consolidated)  
9 )  
10 ) Hon. Judith E. Levy  
11 ) Mag. Mona K. Majzoub  
12 )  
13 \_\_\_\_\_ )

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11 HIGHLY CONFIDENTIAL  
12 VIDEOTAPED DEPOSITION OF BRENT WRIGHT - VOL 2  
13 Wednesday, December 4, 2019  
14 at 9:05 a.m.  
15  
16  
17

18 Taken at: Butzel Long  
41000 Woodward Avenue  
19 Bloomfield Hills, Michigan 48304  
20

21 REPORTED BY: LAURA STEENBERGH, RPR, CRR, RMR, CSR-3707  
22

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1           concerning to a water quality engineer, even water  
2           treatment plant employees, isn't that right?

3    A.    Yes.

4    Q.    Were you concerned when you received the Leanne Walters  
5           test results?

6    A.    When I seen them, yes.

7    Q.    Okay.  Is there a reason why those test results weren't  
8           shared with the Veolia staff who were in a conference  
9           room upstairs at the Flint Water Treatment Plant?

10   A.    Not that I know of.

11                   MS. WEINER:  Objection, assumes facts in not  
12           in evidence, mischaracterizes testimony.

13                   THE WITNESS:  Not that I recall, not that I  
14           know of.

15   BY MS. DEVINE:

16   Q.    Sure.  Did you share the Leanne Walters test results  
17           with the meeting?

18   A.    No, I didn't.  Mike Glasgow mostly dealt with the Leanne  
19           Walters.  I had met her a few times at the plant, he  
20           brought me into a lab, introduced me to her.  The -- the  
21           first time I met Leanne Walters I actually gave her a  
22           tour of plant.

23   Q.    Okay.

24   A.    And then she mostly dealt with Mike, Mike Glasgow.  I

1 know that there was a lot of testing going on at her  
2 house.

3 Q. Would it surprise you that none of those test results or  
4 information were shared with Veolia while they were  
5 on-site?

6 MS. WEINER: Object to form.

7 THE WITNESS: I don't know why they weren't  
8 shared with them.

9 BY MS. DEVINE:

10 Q. Do you think that would be an important piece of  
11 information to provide to Veolia?

12 A. The only thing I recall on the Leanne Walters situation  
13 was that, for one, it didn't meet EPA's regulations on  
14 -- it had a whole-house filter, and we're not supposed  
15 to take lead results from homes with whole house  
16 filters.

17 Q. Okay.

18 A. That's the only -- that's the one thing I do remember  
19 that was -- and that may be why it wasn't shared.

20 Q. Do you recall a conversation with Daugherty Johnson in  
21 February of 2015 where he told plant staff to make  
22 preparations to switch back to Detroit due to water  
23 loss?

24 A. Due to water loss?

1 Q. Yes. Out of a fear that the plant may run out of water  
2 at some point.

3 A. That was actually me.

4 Q. Okay. And did you contact the Genesee County Drain  
5 Commissioner's office?

6 A. Yes, I did. That was the first call I made, and then  
7 the second call I made was the DEQ.

8 Q. And what came of that?

9 A. We were able to get the plant running better. We  
10 couldn't keep up with the main breaks. We had a lot of  
11 main breaks going on. The weather was really cold. And  
12 the plant was maxed out trying to keep up with the main  
13 breaks. Our reserves, clear wells had depleted.

14 Q. Sure.

15 A. And so this is going to take -- you don't just hit a  
16 switch, you know, or open a valve. This is going to  
17 take some time to put all this in place, so, I mean, we  
18 still had time, but time was -- you know, it wasn't  
19 looking good. And so I contacted the drain  
20 commissioner, because they had control over the pipeline  
21 now, and to let them know that there's a chance that we  
22 are going to be switching, that we might need to take  
23 Detroit water in.

24 Q. And it's true, isn't it, that Mr. Ambrose informed you

1 and informed Mr. Johnson that the city could not afford  
2 to switch back to Detroit?

3 A. It wasn't going to happen is what I was informed.

4 Q. Due to financial concerns?

5 A. No, it was -- he didn't say anything about financial  
6 concerns.

7 Q. This was Mr. Ambrose specifically?

8 A. Yes.

9 Q. He told you it's not going to happen?

10 A. It's not going to happen.

11 Q. And that was in when, February 2015?

12 A. That's -- that day. I mean, it happened --

13 Q. The time day that you contacted the drain commissioner?

14 A. Yeah. Everything happened within hours.

15 Q. Sure.

16 A. And --

17 Q. Do you know who Dell Harris is?

18 A. No, I don't.

19 Q. Okay.

20 MS. WEINER: I think we're going over our  
21 time. If you have a just a couple of questions that's  
22 fine.

23 MS. DEVINE: Yep, I just have two or three  
24 questions. Thank you very much.

1 WRIGHT EXHIBIT 79

2 2/16/16 E-Mail - Bates

3 Number COF\_FED\_0132014

4 WAS MARKED BY THE REPORTER

5 FOR IDENTIFICATION

6 BY MS. DEVINE:

7 Q. I'm handing to you what is an e-mail from Dell Harris in  
8 February of 2016.

9 Are you the recipient of that e-mail?

10 A. Yes.

11 Q. Okay. And the attachment is behind that e-mail, and it  
12 appears to reflect a conversation, a record --

13 A. I remember. I remember him now, yes.

14 Q. Okay. I'd like to draw your attention halfway down the  
15 page where the paragraph says, A decision was made.  
16 This states that a decision was made to go to the Flint  
17 River for cost savings. And then later on in the  
18 paragraph it says:

19 This concern was raised and ignored. The  
20 in-house treatment process did not include the addition  
21 of phosphate. It was an administrative decision not to  
22 use a chemical addition. The coating was not maintained  
23 and lead leached out of the service lines and plumbing.

24 Are those your words?